

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JERRY BLASINGAME)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	FILE NO: 1:19-CV-2047-SCJ
)	
OFFICER J. GRUBBS, #6416; and)	
CITY OF ATLANTA/ATLANTA)	
POLICE DEPT.)	
)	
Defendants.)	

**CITY OF ATLANTA'S RESPONSE TO PLAINTIFF'S
STATEMENT OF UNDISPUTED MATERIAL FACTS**

COMES NOW, Defendant City of Atlanta (the “City”) pursuant to FED. R. Civ. P. 56 and Local Rule 56 and hereby responds to Plaintiff’s Statement of Undisputed Material Facts as follows:

**RESPONSE TO PLAINTIFF'S
STATEMENT OF UNDISPUTED MATERIAL FACTS**

1. Movant's fact No. 1 is not material and does not comply with LR 56.1(B)(1).
2. No objection.
3. Objection to “[a]s a result of Defendant Grubbs tasing Mr. Blasingame, Mr. Blasingame fell to forward down a hill, causing his head to strike the concrete pad of a traffic control box” as argumentative and goes to the

issue of causation. Also, the sentence “Defendant Grubbs was concerned Mr. Blasingame would stop breathing and potentially die on the scene” listed in Movant’s fact No. 3 is not material. Finally, Movant’s fact No. 3 does not comply with LR 56.1(B)(1).

4. Movant’s citation does not support No. 4 fact.
5. Objection as argumentative and goes to the issue of causation. Movant’s citation does not support No. 5 fact.
6. Movant’s citation does not support No. 6 fact.
7. Movant’s fact No. 7 is not material.
8. Movant’s citation does not support No. 8 fact.
9. Objection as argumentative and goes to the issue of causation. Movant’s citation does not support No. 9 fact.
10. Movant’s citation does not support No. 10 fact.

Respectfully submitted this 17th day of May 2021.

/s/ Alisha Marie S. Nair
ALISHA MARIE S. NAIR
Attorney
Georgia Bar No. 806033
amnair@atlantaga.gov

City of Atlanta Department of Law
55 Trinity Avenue, Suite 5000
Atlanta, Georgia 30303
Office: 404-546-4185
Fax: 404-588-3239

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CERTIFICATE OF SERVICE

This is to certify that I have served the foregoing ***CITY OF ATLANTA'S
RESPONSE TO PLAINTIFF'S STATEMENT OF UNDISPUTED MATERIAL
FACTS*** upon all counsel of record via this Court's CM/ECF system.

This the 17th day of May 2021.

/s/ Alisha Marie S. Nair
ALISHA MARIE S. NAIR
Attorney
Georgia Bar No. 806033
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